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B A K E R S F I E L D

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In common with most governmental agencies the City of Bakersfield suffers from a shortage of money to provide the desired level of service needed for public safety. This proposal would create an undue hardship upon the city government and the tax payers of Bakersfield. All of the City Departments are being asked to do more with less, this proposal in its current form mandates that our communications systems do less with more.

The intent to reform the spectrum is timely but the proposal as presented would have a very detrimental effect on our radio systems, be very costly, and very difficult, if not impossible, to implement. Reducing bandwidths, power and modulation would all result in a negative impact on existing systems and would not provide a solution to the problems which presently exist. Additional spectrum must be provided in addition to refarming that which is presently allocated for public safety use.

#### Negative aspects of the proposal

1. Imposition of unrealistic power limitations along with reduced elevations will destroy our existing mobile relay operation in the 150-160 Mhz band. The proposed channel arrangements and limitations would result in the need to construct additional sites and base stations to provide the same coverage.

2. Reduction of channel bandwidth to 5 KHz in the 150-160 MHz bands. There is no equipment on the market that has been proven effective at these bandwidths.

3. Reduction of power to 2 W would result in loss of coverage

## RECOMMENDATIONS

1. It is imperative that a frequency plan for mobile relay operation must be developed for the 150-160 MHz band.
2. Power limitations should be decided by a coordination process based on the power necessary to provide adequate signals to the agencies area of political responsibility.
3. Elevation limitations for fixed equipment should be decided by a coordination process based on the signal strength necessary to provide adequate communications for the agencies area of political responsibility, not an HAAT rule set in concrete.
3. Modulation should not be reduced below 4 KHz.
4. Bandwidths should not be reduced beyond the point agreed to as feasible by all manufacturers and users.
5. Any proposed narrowing of channels should consider the best migration plan. Retention of existing center frequencies in all bands is highly desirable.

## CONCLUSION

The City of Bakersfield recognizes the need to reform the spectrum.